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16 **UNITED STATES DISTRICT COURT**  
17  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19  
20 **SAN FRANCISCO DIVISION**  
21

22 IN RE: UBER TECHNOLOGIES, INC.,  
23 PASSENGER SEXUAL ASSAULT  
24 LITIGATION  
25

Case No. 3:23-md-03084-CRB

26 **LEVIN SIMES PLAINTIFFS' MOTION TO**  
27 **CHANGE TIME TO COMPLY WITH**  
28 **COURT'S ORDER CONCERNING NON-**  
**BONA-FIDE RIDE RECEIPTS**

29 This Document Relates to:

30 *Jane Doe LS 333 v. Uber Technologies, Inc., et*  
31 *al., Case No. 3:23-cv-05930-CRB*

32 *Jane Doe LS 397 v. Uber Technologies, Inc., et*  
33 *al., Case No. 3:24-cv-05864-CRB*

Judge: Hon. Charles R. Breyer  
Hearing Date: October 31, 2025  
Time: 10:00 a.m.  
Courtroom: 6 – 17th Floor

**I. INTRODUCTION**

Plaintiffs with MDL IDs 1194 and 2350, represented by Levin Simes LLP, respectfully move pursuant to Federal Rule of Civil Procedure 6(b) and Civil Local Rule 6-3 for a three-week extension of time to comply with the Court's September 9, 2025 Order to Show Cause (Dkt. 3876).

Good cause exists for this modest extension. Levin Simes is currently in trial in the first bellwether case in the parallel Judicial Council Coordinated Proceeding concerning sexual assaults in Ubers, representing our client, Jane Doe LSA 78. That trial commenced on September 8, 2025, and is scheduled to conclude on September 25, 2025. We anticipate post-trial briefing to follow. The demands of that bellwether trial prevent counsel from adequately addressing the discovery issues raised in the Court's Order within the timeframe established by the order.

An extension of three weeks will allow counsel to complete their trial obligations, investigate the authenticity issue more fully, and possibly take steps that would render portions of the Court's Order moot. Uber has refused to stipulate to this extension, necessitating the present motion.

**II. STATEMENT OF FACTS**

On September 9, 2025, the Court issued an Order to Show Cause directed to Plaintiffs with MDL IDs 1194 and 2350, requiring, among other things, production of native versions of ride receipts with metadata, production of related communications, and submission to limited depositions concerning authenticity. (Dkt. 3876.)

Levin Simes LLP represents those Plaintiffs. As set forth in the accompanying declaration, counsel also represents the plaintiff in the first bellwether trial in the parallel JCCP concerning sexual assaults in Ubers. Levin Decl., at ¶ 3. That trial began September 8, 2025, and is expected to conclude September 25, 2025, with post-trial briefing anticipated shortly thereafter. *Id.* at ¶ 3.

Our firm asked counsel for Uber for a three-week extension, pointing to the ongoing trial. *Id.* at ¶ 5; Exh. A to Levin Decl. Uber refused. *Ibid.*

**III. ARGUMENT**

Federal Rule of Civil Procedure 6(b) authorizes the Court to extend deadlines for good

1 cause. Civil Local Rule 6-3 requires the moving party to identify the reasons for the requested  
 2 modification, all prior modifications, and the effect on the schedule.

3 Good cause is present here. The overlap of the JCCP trial makes compliance with the  
 4 existing deadlines impracticable. A three-week extension will not unduly prejudice Uber or disrupt  
 5 the overall schedule of this MDL, but it will permit counsel to investigate the authenticity issues  
 6 more fully and potentially moot the need for further proceedings under the Order.

#### 7 **IV. CONCLUSION**

8 For the foregoing reasons, Plaintiffs respectfully request that the Court extend by three  
 9 weeks the deadlines set forth in the September 9, 2025 Order to Show Cause (Dkt. 3876) as to  
 10 Plaintiffs with MDL IDs 1194 and 2350, such that:

- 11 • The deadline to produce native receipts and metadata is extended from **September 23,**  
 12 **2025 to October 14, 2025;**
- 13 • The deadline to produce related documents and communications is extended from  
 14 **September 23, 2025 to October 14, 2025;** and
- 15 • The deadline to appear for a deposition regarding authenticity is extended from **October 9,**  
 16 **2025 to October 30, 2025.**

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 19  
 20 DATED: September 12, 2025

Respectfully Submitted,

**LEVIN SIMES LLP**

*/s/ William A. Levin*

William A. Levin

Laurel L. Simes

David M. Grimes

Samira J. Bokaie

*Attorneys for LS Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 12, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ William A. Levin  
William A. Levin

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